

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO Court Address: 1437 Bannock Street Denver, CO 80202	<div style="text-align: right;"> <p> FILED Document DATE FILED: April 28, 2005 5:46 PM CO Denver County District Court 2nd JD CASE NUMBER: 2005CV3171 Filing Date: Apr 28 2005 3:46PM MDT Filing ID: 5713695 Review Clerk: Jennifer Madrid </p> <p>▲ COURT USE ONLY ▲</p> </div>
Plaintiffs: KHADIJA ALHADID, FATIMA ALISSA, ALI ALISSA, and MOUSTAFA ALISSA, individually and as next friend and guardian of MOHAMAD ALISSA, MAHMOUD ALISSA, AHMAD ALISSA, AICHA ALISSA, IMAD ALISSA and AMINA ALISSA v. Defendants: PEGGY ANDERSON and STATE FARM INSURANCE COMPANIES	Case Number: Div.: Ctrm.:
Attorneys for Plaintiffs Jeffrey S. Wittebort WALBERG, DAGNER & TUCKER, P.C. Quebec Centre II, Suite 300 7400 East Caley Avenue Englewood, CO 80111-6714 Phone Number: (303) 694-9300 Fax: (303) 694-9370 E-mail: jsw@wdtlaw.com Atty. Reg.#:13849	
<p style="text-align: center;">COMPLAINT</p>	

Plaintiffs, above named, by and through their attorneys, Jeffrey S. Wittebort of Walberg, Dagner & Tucker, P.C., hereby submit the within Complaint.

1. That Plaintiffs are individuals and residents of the State of Colorado.
2. That Defendant Peggy Anderson is an individual, resident of the City and County of Denver, State of Colorado, and upon information and belief was uninsured at the time of the subject accident.
3. That Moustafa Alissa at all relevant times hereto was married to Plaintiff Khadija Alhadid. In addition, Plaintiff Moustafa Alissa and Khadija Alhadid are the natural parents of all additional Plaintiffs named herein.

4. That Fatima Alissa and Ali Alissa are individuals who are above the age of majority. That Mohamad Alissa, Mahmoud Alissa, Amad Alissa, Aicha Alissa, Imad Alissa and Amina Alaliwialissa are individuals and minor children.
5. That Defendant State Farm Insurance Company is an insurance company duly licensed by the State of Colorado to sell insurance, and on date and time of the subject accident was the uninsured motorist carrier for the vehicle owned by Dana Halek which the Plaintiffs were passengers in.
6. That venue is proper in Denver District Court as Defendant Anderson resides in such county and State Farm does business in such county.
7. That on or about June 30, 2002, all named Plaintiffs herein with the exception of Moustafa Alissa were passengers in a vehicle driven by Rayad Mohamed Khankan which was stopped at a traffic signal at South Parker Road at the intersection of Iliff when they were struck from behind by a vehicle driven by Peggy Anderson, who drove her vehicle in a reckless, negligent and careless manner while she was under the influence of alcohol.
8. As a result of the negligent, careless and reckless manner in which Defendant Peggy Anderson drove her subject vehicle, all Plaintiffs herein, with the exception of Moustafa Alissa, have sustained serious and permanent bodily injuries, substantial hospital, doctor and medical bills, past and future pain and suffering and loss of enjoyment of life, scarring, and impairment of earning capacity in an amount to be proven at trial.
9. That as a result of the injuries sustained by his wife, Plaintiff Khadija Alhadid, Plaintiff Moustafa Alissa has been deprived of the companionship, services, and conjugal relations of his wife in an amount to be proven at trial.
10. That as a result of the injuries sustained by their children, Plaintiffs Moustafa Alissa and Khadija Alhadid have sustained the following damages:
 - a. Past and future hospital, doctor, medical and therapy bills.
 - b. Loss of past and future earnings until the minor children reach the age of 18.
 - c. Loss of past and future household services until the children reach the age of 18.
11. That upon information and belief, at the time of the subject accident, Defendant Peggy Anderson, the individual responsible for such accident was uninsured, therefore Plaintiffs are pursuing a claim against State Farm Insurance Company who

was the underinsured carrier for the automobile for which the Plaintiffs were passengers in.

WHEREFORE, Plaintiff's respectfully request this Honorable Court grant them a judgment in an amount to be proven at trial against both Defendants for the above-referenced damages, interest from the date of loss at the statutory rate, costs pursuant to statute, and for such other and further relief as this Court deems appropriate.

DATED this _____ day of _____, 2005.

Respectfully submitted,

*The duly signed original held in the file located at Walberg,
Dagner & Tucker, P.C.*

By: _____
Jeffrey S. Wittebort, #13849
Attorneys for Plaintiffs

PLAINTIFFS' ADDRESS

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